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VIA U.S. MAIL

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RE: Mission Linen Supply's Supplemental CERCLA §104(e) Response No. 2
Omega Superfund Site. Operable Unit-2 (OU2). Whittier, California

Dear Ms. Deschambault & Mr. Berninger:

This letter supplements Mission Linen Supply's ("Mission") December 3, 2009 response, and December 12, 2012 supplemental response, to the United States Environmental Protection Agency's ("EPA's") October 26, 2009 CERCLA §104(e) Request for Information related to the Omega Superfund Site in Whittier, California.

I. INTRODUCTION

Mission bases this supplemental § 104(e) response on its ongoing background investigation related to Mission's former industrial laundry and linen supply facility located at 11920 E. Washington Boulevard, Whittier, California (the "Site").

This supplemental response identifies known and suspected sources of groundwater contamination to the Omega Superfund Site, Operable Unit 2 (“OU2”), and provides EPA with the following data: (1) Mission’s Public Records Review (Exhibit A); (2) Recently Identified Sources of Hexavalent Chromium and Other Contaminants Adjacent to Mission Linen Facility (Exhibit B); (3) the Cal-Tron site (Exhibit C); (4) the Delta Industries site (Exhibit D); (5) the Parker Hannifin site (Exhibit E); and (6) Site A (Chrysler)(OU2 Special Notice Letter recipient) (Exhibit F).

II. BACKGROUND

A. Mission’s Soil & Groundwater Investigation

As part of Mission’s request for a no further action letter (“NFA”) for Site soils, under the oversight and direction of the Los Angeles Regional Water Quality Control Board (“LARWQCB”), Mission conducted substantial investigation of soil and groundwater beneath and in the vicinity of the Site followed by remediation, as detailed in the June 15, 2012 Hydropunch Groundwater Sampling and Hydrogeologic Analysis Report prepared by CGC Environmental (“CGC Report”). Mission developed the scope of work for the CGC Report to satisfy LARWQCB requirements for issuing a soil NFA and delineating off-site groundwater impacts. The CGC Report also includes a thorough Site history and is available on Geotracker.¹ As part of the soil NFA review process, the LARWQCB required a health risk assessment (HRA), which Mission conducted in 2013 based on potential vapor intrusion concerns for future buildings. The results of the HRA indicated that commercial development consistent with the current land use zoning is acceptable.

The CGC Report identified hexavalent chromium and volatile organic compounds (“VOCs”) unrelated to any historical Site operations in the groundwater passing underneath the Mission Site, prompting Mission to conduct the public records review outlined herein to determine known and potential sources of contamination.

B. Site Regulatory Status

On June 7, 2012, Mission met with EPA in San Francisco to discuss its potential liability related to the Omega Superfund Site, Operable Unit 2 (OU2). During that meeting, Mission conveyed its pending plans to redevelop the Site, which has been a vacant lot since Mission discontinued its industrial laundry operations in 1987. In relation to Mission’s redevelopment plans, at Mission’s request, on April 19, 2012, Steve Berninger provided links to information related to EPA guidance

¹ A complete copy of the CGC Report may be found at:
http://geotracker.waterboards.ca.gov/esi/uploads/geo_report/9679855287/SL2041B1503.PDF

documents concerning liability, redevelopment, and bona fide prospective purchasers. At the June 7th meeting, Mission indicated that it had discovered a potential upgradient source of hexavalent chromium and VOC contamination. As EPA had not identified that source as an OU2 potentially responsible party ("PRP"), EPA invited Mission to provide any information regarding PRPs and contamination sources in OU2. At the subsequent March 7, 2013 meeting between EPA and the Omega Downgradient Small PRP Group ("ODSGP") in San Francisco, Mission informed EPA that its ongoing investigation had revealed additional unnamed OU2 contamination sources, and EPA again invited Mission to share such information.

The information below reflects Mission's ongoing investigation into OU2 that has been generally focused in the vicinity of the Site and ODSGP sites.

C. Mission's Public Records Review

Exhibit A attached hereto reflects Mission's review of publically available records and includes an EDR Executive Summary and an Area OU2 Map showing minimally characterized known and suspected VOC and hexavalent chromium sources in the vicinity of the Mission Site. These include the following properties that EPA has not named as OU2 PRPs: (1) Bella Vista Drapery Cleaners; (2) former Whittier Plating ("old" location)/Go. Inc.; (3) Cal-Tron Plating; (4) Quaker City Plating & Silversmith; (5) Tin Plating; (6) Sur Lite/Steele Processing; (7) former Delta Industries; (8) Parker Hannifin; (9) Steven Label Corp.; and former Whittier Plating ("new" location).

Mission provides this material to EPA to facilitate OU2 discussions, and requests that EPA and/or state regulatory agencies identify previous or current owners and operators of such properties as OU2 PRPs, or otherwise require them to investigate suspected releases of hexavalent chromium, VOCs, and other contaminants to OU2.

D. Recently Identified Sources of Hexavalent Chromium and Other Contaminants Adjacent to Mission Linen Facility

The attached **Exhibit B** identifies the property located at 11940 East Washington Boulevard in Santa Fe Springs, California (the Whittier Plating/Go Inc. site), which is immediately to the east of the Mission Site, in an upgradient groundwater flow direction, as a previously unrecognized source of hexavalent chromium, VOCs, and other contaminants of concern related to OU2. Releases from the Whittier Plating/Go Inc. property appear to be a significant source of the hexavalent chromium contamination observed in the groundwater passing beneath the Mission Site. **Exhibit B** presents the Mission Site background, Whittier Plating/Go Inc. site data summary, and a request for EPA and/or state regulatory agencies to require previous or current owners and operators of this property to investigate suspected releases of hexavalent chromium and other contaminants.

**E. Cal-Tron Facility
11919 Rivera Road, Santa Fe Springs, California**

Exhibit C summarizes findings for the Cal-Tron Plating facility, located at 11919 Rivera Road in Santa Fe Springs, California (the Site). In light of ongoing evaluation of potential contributors to the OU2 groundwater plume, **Exhibit C** attaches documents that were identified during review of City of Santa Fe Springs Fire Department files, and on the state Envirostor website. The Cal-Tron site has a history of discharge and hazardous materials handling violations, enforcement actions, and was recommended for assessment by the state in 2008. Despite these past discharges and regulatory concerns, the files reviewed do not indicate that any subsurface assessment of the Cal-Tron site has been required or conducted. **Exhibit C** summarizes the findings, and recommends completion of the assessment of the Cal-Tron site, which has been an active plating facility since 1974.

**F. Former Delta Industries
8137 Allport Avenue, Santa Fe Springs, California**

Exhibit D summarizes findings for the former Delta Industries facility, located at 8317 Allport Avenue in Santa Fe Springs, California, and includes documents identified on the state Geotracker website. Based on a report detailing soil sampling results (EMCON Associates, 1990), the Site was used for the manufacturing of vapor degreasers and related equipment, and solvents were stored in above-ground storage tanks. The former Delta Industries site received closure from the LARWQCB in 1996 based on limited characterization and with actionable levels of tetrachloroethene (PCE) remaining in-place due to their exceedance of commercial/industrial risk-based screening levels, and screening levels for protection of leaching to groundwater. **Exhibit D** summarizes the findings, and recommends additional characterization of the Site.

Based on a report detailing soil sampling results (EMCON Associates, 1990), the Site was used for the manufacturing of vapor degreasers and related equipment, and solvents were stored in above-ground storage tanks.

**G. Former Parker Hannifin Facility
11808 Burke Street, Santa Fe Springs, California**

Exhibit E summarizes findings for the former Parker Hannifin facility, located at 11808 Burke Street in Santa Fe Springs, California. The Parker Hannifin website indicates that they are a global leader in motion and control technologies with more than \$10 billion in annual sales. In light of ongoing evaluation of potential contributors to the OU2 plume, **Exhibit E** includes documents identified on the state Envirostor website and the Parker Hannifin website. In 1997, state regulators recommended additional assessment for the Parker Hannifin site. The files reviewed do not indicate that the assessment has been conducted.

The following summarizes the findings, and recommends completion of the additional assessment of the Parker Hannifin site:

The EPA Region IX Site Screening Checklist indicates the following:

- Parker Hannifin operated the facility until 1996;
- A 1995 information request indicated that 1,260 gallons of 1,1,1-trichloroethane (TCA) was used annually at the Parker Hannifin site;
- County records indicated that 55 gallons of cutting and lubricating fluids, 45 gallons of 1,1,1-TCA, and 150 gallons of water-based paints washdown were generated monthly;
- PCE and trichloroethene (TCE) use was suspected;
- A 385-gallon clarifier treated wastewater prior to discharge to the sewer system. Los Angeles County Public Works issued a discharge permit in 1986;
- No soil, groundwater, or soil-vapor samples were reported for the Site. Further investigation under state oversight was recommended. The prioritization screening risk analysis indicated a low hazard factor value and a medium vulnerability factor value.

Additional characterization of the Parker Hannifin site is recommended based in part on the fact that 1,4-dioxane was used as a solvent stabilizer, particularly for 1,1,1-TCA along with the suspected use of PCE and TCE. The documented use of 1,1,1-TCA indicates a potential for contributions of 1,4-dioxane to the subsurface and OU2 plume. Exhibit E outlines additional bases for requiring further characterization.

H. Site A (Chrysler)
12128 Burke Street
Santa Fe Springs, California

Exhibit F summarizes findings for Site A, an OU2 Special Notice Letter recipient, based on review of documents received from the EPA through a Freedom of Information Act (“FOIA”) request. While EPA’s Remedial Investigation Report (RI) for OU2 describes releases of VOCs at Site A (see CH2MHill, 2010), Exhibit F provides additional discussion of the VOC investigation results and more particularly identifies Site A as a suspected source of hexavalent chromium to OU2.

Additional assessment of the magnitude and extent of hexavalent chromium in the subsurface is recommended based on historical operations at Site A. Prior to redevelopment in the 1990s, Site A was a portion of the 40-acre Chrysler Nu Car Prep Facility, located at 12140 Slauson Avenue in Santa Fe Springs, California. Multiple underground storage tanks, paint booths, and clarifiers were

used across the Site. As described in **Exhibit F**, Site A includes: (1) a clarifier (CL-2), located in the northwestern portion of the property, which is a known source of chlorinated solvents to soil and groundwater; and (2) a spot plating shop, located in the southeastern portion, which is a known source of hexavalent chromium to soil and groundwater.

i. Under-characterized VOCs

The clarifier (CL-2), (removed in 1988), was identified as a source of total petroleum hydrocarbons ("TPH") and VOCs, including PCE. In 1989, visibly stained soil with chemical odor was identified near and beneath the former clarifier location. In 1990, the clarifier area was excavated to depths of 26-32 feet bgs. Post-excavation sidewall/bottom samples, representing soils remaining in-place, reported the highest PCE levels observed at Site A, suggesting that higher PCE concentrations existed in the excavated soil, which was located closer to the clarifier release (Figure 4 and Table 3, Converse, 1991). However, no groundwater wells were installed near the clarifier source area until 1994, several years after excavation was completed (Dames & Moore, 1996). The well closest to the clarifier, Well GW-3, was located ~200 feet downgradient of the clarifier, and reported more than 1,000 micrograms per liter ($\mu\text{g/L}$) of PCE in 1991 which declined to below 50 $\mu\text{g/L}$ of PCE in 1994, after completion of excavation activities (Figures 4 and 5, Dames and Moore, 1996).

In 1999, the LARWQCB indicated that:

- Contamination associated with the clarifier had impacted groundwater;
- An upgradient plume was migrating onsite; and
- No further action was required while groundwater conditions were being evaluated in the Santa Fe Springs area.

The under-characterized nature of Site A suggests that the historic VOC contributions to the OU2 may be underestimated. The quantification of VOC contributions is further complicated by the location of the identified Site A release areas within the core of the OU2 plume..

ii. Hexavalent Chromium

Based on the regulatory agency file review findings presented by Dames & Moore in documents dated January 11, 1989 and January 10, 1992:

- A Notice of Violation ("NOV") was issued on March 2, 1970 for the discharge of 150 parts per million (ppm) of hexavalent chromium from the spot plating area (front-end building) to the storm drain;
- The discharge was diverted to a clarifier for pretreatment (Dames & Moore, 1989) and/or subsequently ceased by plugging the floor drains (Dames & Moore, 1992);

- The clarifier associated with the front-end building (CL-4) discharged directly to the flood control channel located along the southern property boundary;
- A 1971 County industrial waste survey indicated that waste chrome was drummed and transported offsite for disposal; and
- Spot plating operations appear to continue until facility shutdown in 1988. Based on the Dames & Moore documents, files at the City of Santa Fe Springs Fire Department and Los Angeles County Department of Public Works were reviewed to acquire supplemental information regarding the generation and discharge of hexavalent chromium at Site A. The 1970 NOV was not located in the files reviewed.

An estimate of the hexavalent chromium discharge rate from Site A is calculated to be 91 to 230 pounds per year using the following assumptions:

- Discharge rates of 200 to 500 gallons per day; and
- 150 ppm (milligrams per liter) of hexavalent chromium.

During seven years (1964-1971) of potential discharges from spot plating operations, 640 to 1,600 pounds of hexavalent chromium may have entered to the flood channel. Between 1971 and facility shutdown in 1988, spot plating operations continued with offsite disposal of generated chromium-bearing wastes. Releases of hexavalent chromium to soil and groundwater in relation to Site A operations during this timeframe are also suspected.

Soil borings and grab samples near the front-end building (SB-39, SB-40, SB-41) were analyzed for TPH and VOCs but not hexavalent chromium (Dames & Moore, 1996). The 1996 Dames & Moore Report recommends no further action for TPH and VOCs, but fails to address the scope and extent of hexavalent chromium contamination.

In light of these findings and the emerging concern of hexavalent chromium contamination in OU2, additional investigation of Site A soils and groundwater is warranted to evaluate the magnitude and extent of hexavalent chromium in the subsurface.

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Mr. Stephen Berninger
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III. CONCLUSION

Mission submits this second supplemental §104(e) response in relation to its ongoing investigation of the Site and vicinity. Mission welcomes the opportunity to meet with EPA to continue further discussions related to the issues outlined herein.

Do not hesitate to contact me at (916) 646-8219 regarding any questions concerning the above or attached.

Very truly yours,



LEWIS BRISBOIS BISGAARD & SMITH LLP

TJS

cc: Tony Mancuso, Mission Linen Supply
David Chapman, Law Office of David T. Chapman
Don Moore, Environmental Risk Solutions, Inc.
Khaled Rahman, The Source Group, Inc.

Enclosures